

MEMORANDUM

DATE: May 18, 2006

TO: Oil Spill Advisory Council

FROM: Tugs Technical Advisory Committee

SUBJECT: Recommendations to full Council on Improvements to the Tug Escort System

I. Composition of Technical Advisory Council

The Committee is comprised of Stuart Downer, Council Member and Chair; Jim Davis, Council Member; Mike Doherty, Council Member; Bruce Wishart, Lobbyist for People for Puget Sound; Captain Andy Coe, Puget Sound Pilots; and Chad Bowechop, Makah Tribe.

Others who participated in the discussions were Norm Davis, Washington State Department of Ecology ("WDOE"); Jon Neel, WDOE; Frank Holmes, Western States Petroleum Association ("WSPA"); Greg Hanon, WSPA; Ed Irish, WSPA; John Veentjer, Pacific Merchant Shippers Association; Matt Brown, Foss Maritime; Richard Rodger, Senate Water, Energy and Environment staff; Jason Tama, U.S. Coast Guard; Rich Berkowitz, Transportation Institute; Fred Felleman, WAVE; Jeff Shaw, Council Member; David Sawicki, British Petroleum; and Craig Lee of the public.

II. Recommendations to Council

The following statements reflect this TAC's recommendations to the full Council:

In keeping with the Council's mandate of a "State of the Art," "O" spill prevention program for the State of Washington, the sub-committee was charged with the task of reviewing the universe of reports on "Tug Escorts" for oil tankers, the International Tug of Opportunity System, and the Neah Bay rescue/response tug. They were also charged with making recommendations to the Council on any changes to the above, if needed, along with other tug escort requirements and other areas rescue/response tugs could be needed.

III. The Committee submits the following recommendations to the Council:

A. Escort tugs for oil tankers and other escort requirements

The TAC is not recommending that any of the current escort regulations for oil tankers traveling past Port Angeles be changed at this time. It is the opinion of this TAC that current escort regulations for these vessels in this area

are “State of the Art.” The TAC reserves the right to amend its initial report at the July 21, 2006 Council meeting.

The TAC (if made a standing committee) will review if additional escort requirements for other vessels, and length of escorts, should be recommended in the future for other tank vessels (tank barges- both ATB and towed), petroleum or chemical product tankers, foreign flagged vessels, bulk carriers, as well as cargo carriers. The standing TAC will also review and make recommendations on any regulations changes that would impact current escort requirements.

The Tug Committee recognizes the fact that, even with ITOS, tanker escorts, and a year round rescue tug at Neah Bay, there would still be several high risk locations in Washington waters that require additional safeguards in order to achieve “state of the art” protection for Puget Sound and the outer coast. In particular, the Committee discussed the need to better safeguard the Haro Strait/ Boundary Pass area, as well as the Columbia Bar/ southern coast area through the placement of additional rescue tugs. These areas were identified as high risk due to the following factors:

- significant navigational hazards;
- vessel traffic;
- important natural resources at risk; and
- the lack of available and capable tugs operating in the vicinity on a regular basis.

The Committee feels that additional studies, or information-gathering, would be useful in making final recommendations on the stationing of additional tugs. The Committee recommends the establishment of a “tug fund” to allow additional rescue tug(s) to be stationed at strategic locations to better safeguard these locations based on the outcome of such research. The fund would be administered by the Department of Ecology.

B. Neah Bay Tug- Duration and Funding

The TAC’s recommendation to the full Council is that the Council endorse a fully funded, year-round “Straits and Coastal Waters Response/Rescue Tug,” at or near Neah Bay, Washington. The primary mission of this dedicated straits and coastal waters response/rescue tug is to respond to, standby, and when needed, provide towing services for disabled or drifting vessels to prevent a pollution event.

This “State Of the Art” vessel will be of sufficient power, maneuverability, and deck configuration to timely respond to any vessel, within the response area, in sea state conditions up to and including extreme weather.

The response area of operation will encompass the Pacific Coast of the State of Washington, along with all “Marine Waters” within 60 nautical miles from Buoy “J” at the entrance to the Strait of Juan de Fuca, the Strait, and its western approaches.

In addition, the “Tug” should have secondary capabilities of the following, as long as the primary service of the tug is not compromised or jeopardized:

- spill response;
- firefighting; and
- early salvage capabilities, as part of a critical partner of a salvage company.

C. International Tug of Opportunity System

ITOS is “a good tool to have in the tool box,” but is not something on which to rely completely. Tugs may not abandon a tow to be a primary rescue tug, and they can not be relied on to be **in the right place at the right time**, with or without tows, so as to be a critical part of the “State of the Art,” “O” spill prevention system for the State of Washington.

D. Other Response Tugs- Location, Duration, and Funding

The TAC recognizes the fact that, even with ITOS, current oil tanker escorts, and a year round response/rescue tug stationed at or near Neah Bay, Washington, there would still be several high risk locations (in Washington waters), which could require additional safeguards in order to achieve “State of the Art” prevention protection. In particular, the TAC discussed the Haro Strait/Boundary Pass, the southern Washington coast, and Columbia River areas that could benefit from the placement of additional response/rescue tugs. These areas have a deficiency of available and capable tugs operating on a regular basis under ITOS. These areas were identified as high risk due to significant navigational hazards, vessel traffic, as well as being areas of important natural resources to the State.

The TAC does recommend the establishment of a “Tug Fund” (to be administered by WDOE) to allow the placement of additional response/rescue tug(s) at strategic locations based on the outcome of the additional studies.

The TAC feels that additional studies or information-gathering would be useful in making any final recommendations on the placement of additional tugs. The TAC will amend its initial report to the Council to cover this subject at the Council’s July 21, 2006 meeting, or when additional studies are completed.

E. Additional Study

The TAC does recommend that an update be done on the many response/rescue tug studies that have been done, and that this study contain all up-

to-date information, including the effect of the STCW standards, industry voluntary upgrades, and new USCG requirements. The TAC would like to see if any of these new standards would have any effect on the placement of current or future tug resources.

III. Closing

The TAC recommends to the Council that a standing sub-committee (TAC) is formed on Vessel Escort Requirements, Response/Rescue Tugs, Spill Response Vessels, and ITOS as critical partners in a “State of the Art,” “O”spill prevention program for the State of Washington.

This TAC will review all changes in regulations, vessel traffic, and all other changes that could affect vessel escorting, response/rescue vessels, as well as spill response vessels. The TAC will make recommendations to the Council on possible actions that would be needed because of those changes. The TAC will continually review current practices, equipment types, crew training, and equipment locations in order to ensure the establishment of a “State of the Art” prevention and response program, as well as make recommendations on additional studies and funding requirements in order to maintain the best possible system of prevention for the citizens of the State of Washington.